

SOLOMON BLUM HEYMAN LLP  
40 Wall Street, 35<sup>th</sup> Floor  
New York, New York 10005-1324  
(212) 267-7600

November 15, 2022

Hon. Denise Cote  
U.S. District Judge  
Southern District of NY  
500 Pearl St., Room 1910  
New York, NY 10007

Re: McGowan et al. v. Stanley, et. al (22-cv-06971)

Dear Judge Cote:

The Court has scheduled a preliminary conference in this matter on November 17, 2022, at 11:30 A.M. I now have a critical motion scheduled at 11:00 A.M. in Kings County Surrogate's Court. The issue in Kings County may be settled by then, but given the history of the matter, that is not probable.

Therefore, I would respectfully request that the conference be rescheduled for a date in the near future. This is the first such request. I would also mention that the answer in this matter was filed October 31, 2022, per stipulation. Additional time could also help both sides be more fully prepared.

I have reached out to opposing counsel, who is fine with an adjournment.

Thank you for your consideration.

Respectfully,

S/Ambrose M. Richardson

Ambrose Madison Richardson  
Counsel for Plaintiffs

cc. Thomas Atkinson, Esq. (via email)